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Attorneys for Defendant  
WALMART INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

KORTNEY OLSON,  
Plaintiff,  
v.  
WALMART STORES INC. AND  
WONDER NATION,  
Defendants.

Case No. 2:20-cv-00152-GMN-NJK

**UNOPPOSED MOTION TO  
EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT**

**(Second Request)**

Complaint served: February 7, 2020  
Current response date: March 30, 2020  
New response date: April 29, 2020

Judge: Gloria M. Navarro  
Magistrate Judge: Nancy J. Koppe

1 According to Local Rule IA 6-1 of the United States District Court for the  
2 District of Nevada, Walmart Inc., owner of the subsidiary that owns the trademark  
3 Wonder Nation ( “Defendant”), with Plaintiff’s consent, respectively requests that  
4 the Court extend Defendant’s time to respond to Plaintiff’s Complaint. This is  
5 Defendant’s second request.

6 **MEMORANDUM OF POINTS AND AUTHORITIES**

7 On January 22, 2020, Plaintiff filed a Complaint with the United States  
8 District Court for the District of Nevada. On February 7, 2020, Plaintiff caused  
9 copies of the Summons and Complaint to be delivered and served on Defendant.

10 Plaintiff, who originally filed her complaint pro se, retained counsel and  
11 granted Defendant a 30-day extension of time from its original response date, which  
12 the Court granted, pursuant to which Defendant has until March 30, 2020 to  
13 answer, move to dismiss or strike, or otherwise respond to Plaintiff’s Complaint.

14 Plaintiff and Defendant have been in settlement discussions, which are  
15 currently ongoing.

16 In an effort to continue the discussions, Plaintiff has granted Defendant an  
17 additional 30-day extension of time from its current responses date, pursuant to  
18 which Defendant shall have until April 29, 2020 to answer, move to dismiss or  
19 strike, or otherwise respond to Plaintiff’s Complaint. Plaintiff’s counsel is not yet  
20 admitted in Nevada, nor has he retained the services of local counsel in this  
21 jurisdiction.

22 The Parties’ settlement negotiations and interests in resolving this dispute  
23 serve as just cause for the filing of this request. Defendant reserves the right to file  
24 an answer, motion or dismiss or strike, or other responsive pleading prior to its  
25 April 29, 2020 deadline.

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1 Therefore, Defendant respectfully moves this Court for an extension until  
2 and including **April 29, 2020** to answer, move to dismiss or strike, or otherwise  
3 respond to the Complaint filed in this matter.

4  
5 Dated: March 30, 2020

**ROPERS MAJESKI KOHN &  
BENTLEY PC AND ARENT FOX LLP**

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7  
8 By: /s/ Allan E. Anderson

9 STEPHEN J. ERIGERO (SBN 11562)  
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11 ALLAN E. ANDERSON  
12 JAKE GILBERT  
13 DANIELLE W. BULGER

14 Attorneys for Defendant  
15 WALMART INC.

16 IT IS SO ORDERED.

17 Dated: March 31, 2020

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Nancy J. Koppe

21 United States Magistrate Judge  
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